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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8
9 **JULIA MARTINEZ**, an individual,

10 Plaintiff,

11 vs.

12 **USAA CASUALTY INSURANCE**
13 **COMPANY**, a foreign insurance company;
DOES I through X; ROE ENTITIES I
14 through X,

15 Defendants.

16
17 Case No.: 2:24-cv-01290-GMN-BNW

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

(THIRD REQUEST)

18 Pursuant to LR 6-1 and LR26-4, the parties, by and through their respective counsel of
19 record, hereby stipulate and agree that there is good cause to extend the discovery deadlines by
20 sixty (60) days in the operative discovery plan [ECF No. 11], as set forth below.

21 **A. Pursuant to LR 26-4(a), the parties stipulate that the following discovery has been
22 completed:**

- 23 1. The parties have served initial disclosures pursuant to FRCP 26(a)(1).
- 24 2. Plaintiff has propounded written discovery on Defendants.
- 25 3. Defendants have propounded written discovery on Plaintiff.
- 26 4. Plaintiff has answered written discovery requests.
- 27 5. Defendant has answered written discovery requests.
- 28 6. The parties have held a meet and confer regarding certain of the Defendants'

1 responses to discovery.

2 7. Defendant recently obtained new counsel, and as such, Mary E. Bacon of Spencer
3 Fane LLP, is substituting in as attorney of record in place of Robert W. Freeman
4 and Jennifer A. Taylor of Lewis Brisbois Bisgaard & Smith.

5 **B. Pursuant to LR 26-3(b), the parties stipulate that they need to complete the following
6 discovery:**

- 7 1. Deposition of Plaintiff.
8 2. Deposition of Defendant's FRCP 30(b)(6) designee.
9 3. Deposition of percipient witnesses.
10 4. Depositions of Plaintiff's medical providers.
11 5. Depositions of the parties' expert witnesses.
12 6. Disclosure of expert and rebuttal expert witnesses.
13 7. Depositions of the parties' expert witnesses.
14 8. Any other potential depositions or written discovery which may become necessary
15 as discovery continues.

16 **C. Pursuant to LR 26-3(c), the parties stipulate an extension is needed for the following
17 reasons:**

18 The parties are working together to afford Defendant's newly retained counsel adequate
19 time to get up to speed on the case and meaningfully participate in the discovery process. The
20 parties are also discussing whether settlement is a possibility.

21 No party will be prejudiced by the extension, and the requested extension is made in good
22 faith and not for purposes of delay. Based on the foregoing, the parties respectfully request that
23 the Court grant their joint request to extend the deadline by sixty (60) days in accordance with the
24 requested amended discovery deadlines.

25 **D. Pursuant to LR 26-3(d), the parties stipulate to the following proposed schedule for
26 completing all remaining discovery:**

27 The parties agree to extend all the discovery deadlines in this case by sixty (60) days, as
28 set forth below:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	Monday, August 4, 2025	Friday, October 3, 2025
Deadline to Amend Pleadings or Add Parties	Closed	Closed
Expert Disclosures	Thursday, June 5, 2025	Monday, August 4, 2025
Rebuttal Expert Disclosures	Monday, July 7, 2025	Friday, September 5, 2025
Dispositive Motions	Tuesday, September 2, 2025	Monday, September 3, 2025
Joint Pretrial Order	Thursday, October 2, 2025	Monday, December 1, 2025

E. Current Trial Date

A trial date has not been set.

This request is made in good faith and not for the purpose of delay.

Dated this 29th day of April, 2025.

Dated this 29th day of April, 2025.

THE BIG GUNS INJURY ATTORNEYS

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ORDER

Though the Court GRANTS the parties' above stipulation, it is not inclined to grant future continuances. IT IS SO ORDERED.

Dated: April 30, 2025

Ben Wexler
UNITED STATES MAGISTRATE JUDGE